

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Jennifer Maudlin,

Plaintiff,

v.

Inside Out, Inc. and William Stout,

Defendants.

Civil Action No. 3:13-cv-00354

Chief Magistrate Judge Sharon L. Ovington

PLAINTIFF'S MOTION TO TO COMPEL DISCOVERY

Plaintiff, by and through her counsel, respectfully moves this Court to enter an order to compel discovery. In support of this motion, Plaintiff states as follows:

1. Plaintiff served her First Set of Interrogatories and First Set of Document Requests upon Defendants on September 3, 2014.
2. Defendants served their Objections and Answers to Plaintiff's Discovery Requests on November 14, 2014.
3. From November 25, through January 6, the parties engaged in consultation and several rounds of back-and-forth letters and emails. Certain disputes could not be resolved between the parties. The certification of Freda Levenson, Trial attorney for Plaintiff, is attached hereto, setting forth the extrajudicial means that were attempted to resolve the discovery differences.

4. For the reasons set forth in Plaintiff's accompanying Memorandum of Law in support of this motion, Plaintiff moves this Court to compel Defendants to comply with the discovery requests set forth and discussed in that Memorandum.

Respectfully submitted,

/s/ Freda J. Levenson

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CERTIFICATION OF FREDA J. LEVENSON

The parties attempted to resolve their discovery differences by conducting a telephonic discovery consultation on December 5, 2014 pursuant to Local Rule 37.1, and by the exchange of 4 letters, copies of which are attached to Plaintiff's Memorandum in Support of this Motion.

/s/ Freda J. Levenson

Freda J. Levenson (0045916)

Trial Attorney for Plaintiff

CERTIFICATE OF SERVICE

The foregoing motion was filed on the 15th day of January, 2015 through the Court's Electronic Filing System and parties will be served and may obtain copies electronically through the operation of the Electronic Filing System.

/s/ Freda J. Levenson

Freda J. Levenson (0045916)

Trial Attorney for Plaintiff